

**OLGA DEMYANENKO-TODD,
Individually and on Behalf of All
Others Similarly Situated,**

Plaintiffs,

V.

**NAVIENT CORPORATION,
NAVIENT SOLUTIONS, INC. and
NAVIENT SOLUTIONS, LLC,**

Defendants.

NO. 17-CV-00772

JUDGE MARIANI

ELECTRONICALLY FILED

DEFENDANT'S MOTION TO STRIKE OR PRECLUDE CLASS ACTION ALLEGATIONS

Pursuant to Local Rule 7.1, Defendant Navient Solutions, LLC hereby moves to strike or preclude the class action allegations in the First Amended Complaint in the above-captioned matter. The grounds supporting this motion are set forth in the accompanying memorandum of law in accordance with Local Rule 7.5. Pursuant to Local Rule 7.9, Navient Solutions, LLC requests oral argument in relation to this motion.¹

¹ As set forth in the accompanying brief, Defendant Navient Corporation joins in this Motion.

Respectfully submitted,

/s/ Daniel T. Brier

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LLC

Dated: November 10, 2017

CERTIFICATE OF NON-CONCURRENCE

I, Daniel T. Brier hereby certify that I sought the concurrence of counsel for the Plaintiffs, Robert D. Schaub, Esquire, in this Motion. Mr. Schaub does not concur in the Motion

/s/ Daniel T. Brier

Date: November 10, 2017

CERTIFICATE OF SERVICE

I, Daniel T. Brier, hereby certify that a true and correct copy of the foregoing Motion To Strike or Preclude Class Action Allegations was served upon the following counsel of record via the Court's ECF system on this 10th day of November, 2017:

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/s/ Daniel T. Brier
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